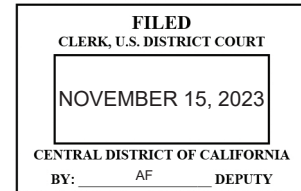


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8



9 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

No. 2:23-cr-00560-SB

13 Plaintiff,

GOVERNMENT'S EX PARTE APPLICATION  
FOR ORDER SEALING INDICTMENT AND

14 v. RELATED DOCUMENTS; DECLARATION OF

AARON FRUMKIN

15 IVAN KOVALEV,

**(UNDER SEAL)**

16 Defendant.

17  
18 The government hereby applies ex parte for an order that the  
19 indictment and any related documents in the above-titled case (except  
20 the arrest warrants for the charged defendant) be kept under seal  
21 until the government files a "Report Commencing Criminal Action" in  
22 this matter.

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1        This ex parte application is made pursuant to Federal Rule of  
2 Criminal Procedure 6(e)(4) and is based on the attached declaration  
3 of AARON FRUMKIN.

4        Dated: November 14, 2023

Respectfully submitted,

5                    E. MARTIN ESTRADA  
6                    United States Attorney

7                    CAMERON L. SCHROEDER  
8                    Assistant United States Attorney  
                    Chief, National Security Division

9                                        /s/                      
10                    AARON FRUMKIN  
                    Assistant United States Attorney

11                    Attorneys for Plaintiff  
12                    UNITED STATES OF AMERICA  
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**DECLARATION OF AARON FRUMKIN**

I, AARON FRUMKIN, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Ivan Kovalev, No. Enter Case No., the indictment in which is being presented to a federal grand jury in the Central District of California on November 15, 2023.

2. Defendant has not been taken into custody on the charges contained in the indictment and has been informed that he is being named as a defendant in the indictment to be presented to the grand jury on November 15, 2023. The likelihood of apprehending defendant might jeopardized if the indictment in this case was made publicly available before defendant is taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment and the government files a "Report Commencing Criminal Action" in this matter.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on November 14, 2023.

/s/

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AARON FRUMKIN